

STATE OF SOUTH CAROLINA
BEFORE THE PUBLIC SERVICE COMMISSION
DOCKET NO. 2021-192-E

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Dominion Energy South Carolina,)	
Incorporated Coal Retirement Docket)	PETITION TO INTERVENE
Opened Pursuant to Commission Order)	
No. 2021-418)	
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The South Carolina Coastal Conservation League (“CCL”) and Southern Alliance for Clean Energy (“SACE”) (collectively, “Petitioners”) respectfully petition the Public Service Commission of South Carolina (“Commission”) to intervene in the above-captioned docket pursuant to R.103-825 of the Commission’s rules of practice and procedure. In support of this petition, Petitioners state as follows:

1. Following the Commission’s acceptance of Dominion Energy South Carolina Incorporated’s (“DESC” or “Company”) Modified 2020 Integrated Resource Plan (“IRP”), the Commission opened this docket on June 9, 2021, to evaluate DESC’s retirement of coal plants. Order No. 2021-418. In its Modified 2020 IRP, DESC selected Resource Plan 8 as its preferred portfolio, which proposes to retire the Wateree and Williams coal plants in 2028 and convert the Cope coal plant to natural gas in 2030.

2. In the Commission’s order rejecting DESC’s Original 2020 IRP, the Commission “require[d] DESC to perform a comprehensive coal retirement analysis to inform development of its 2022 IRP Update and its 2023 IRP.” Order No. 2020-832 at 17. In support of its directive, the Commission concluded that the Company’s original coal retirement analysis did not satisfy Act 62’s requirement that a utility consider “facility

retirement assumptions” when developing various resource portfolios. S.C. Code Ann. § 58-37-40(B)(1)(e)(ii). DESC also failed in its Original 2020 IRP to “assess[] all of the costs and benefits of near and mid-term retirement dates such as capital expenditures, environmental expenditures” and “consider[] all available resources as potential replacements.” Order No. 2020-832 at 39.

3. Petitioners have intervened and are actively participating in DESC’s ongoing 2020 IRP proceeding (Docket No. 2019-226-E).

4. CCL is a nonprofit corporation organized under the laws of the State of South Carolina whose mission is to protect the natural environment of the South Carolina coastal plain and to enhance the quality of life in its communities by working with individuals, businesses, and government to ensure balanced solutions. CCL and its members support the development of energy policy that is in the public interest of South Carolinians. CCL has members in South Carolina who receive electricity service from DESC and will be impacted by the coal retirement decisions made in this proceeding, which will shape the Company’s supply-side resource portfolio and affect the cost of electricity. The principal address of CCL is 131 Spring Street, Charleston, South Carolina 29402.

5. SACE is a nonprofit organization whose mission is to promote responsible and equitable energy choices to ensure clean, safe and healthy communities throughout the Southeast. SACE and its members are interested in promoting greater reliance on clean energy resources to meet the South’s energy needs. Like CCL, SACE has members in South Carolina who receive electricity service from DESC and will be impacted by the coal retirement decisions made in this proceeding, which will shape the Company’s supply-

side resource portfolio and affect the cost of electricity. SACE's principal address is P.O. Box 1842, Knoxville, Tennessee 37901. SACE also has offices in Georgia and North Carolina, and in-state staff in Florida and South Carolina.

6. Through their involvement in this proceeding, Petitioners seek to promote the adoption of near term renewables and clean energy alternatives to replace coal-powered generation. In addition, Petitioners seek to ensure that DESC is undertaking an EFA-compliant planning process in which it properly considers and accurately estimates the cost of alternative supply and demand resources. Participation in this proceeding is aimed at supporting clean energy decisions that will lead to cleaner, safer, and healthier communities for all South Carolinians.

7. Pursuant to R. 103-804(T) of the Commission's Rules of Practice and Procedure, the Petitioners are represented by counsel in this proceeding:

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WHEREFORE, Petitioners pray that they be allowed to intervene as a party of record and participate fully in this proceeding.

Respectfully submitted this 2nd day of August, 2021.

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CERTIFICATE OF SERVICE

I hereby certify that the parties listed below have been served via first class U.S. Mail or electronic mail with a copy of the *Petition to Intervene* of South Carolina Coastal Conservation League and Southern Alliance for Clean Energy.

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This 2nd day of August, 2021.

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